

The operating procedures of Paul Bunyan Rural Telephone Cooperative ensure compliance with the FCC's CPNI Rules. Our procedures are as follows:

Marketing

Our company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Each customer's record contains a designation identifying whether or not we have obtained, through the processes permitted by the FCC's rules, the customer's approval to use, disclose or permit access to his or her CPNI.

Our company accesses and uses a customer's CPNI to market our own communication-related services (outside a customer's current relationship) only after the customer's Opt-Out consent has been obtained in compliance with FCC Rule 64.2008, and which consent has not been revoked by the customer. Every two years our company (a) provides a notice of customers' rights to restrict use and disclosure of, and access to, their CPNI, in compliance with FCC Rule 64.2008, and (b) solicits Opt Out consent for the use of the customer CPNI, in compliance with FCC Rule 64.2008, to each customer who has given Opt Out consent.

CPNI Safeguards

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees. Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-office visit. Our company does not disclose CDR records over the phone. A customer must come to our office and present valid photo identification in order to gain this information.

Our company has established password protection for customers' online accounts. Our company also includes terms specifying the confidentiality and use of CPNI in its contract with business customers that are served by a dedicated account representative.

Our company notifies a customer immediately of changes in: a customer's incorrect response to security questions, change of address of record, or an online account change.

CPNI Recordkeeping and Reporting

Our company maintains a record of our own marketing campaigns that use customer CPNI. We maintain these records for at least one year.

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the “opt out” mechanisms do not work properly.

Our company is prepared to notify the US Secret Service and the FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after seven business days following notification of the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses for at least two years.